

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF )  
DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

v. )

CIVIL ACTION NO. 2:07cv1104-mht

EIGHTEEN THOUSAND FOUR )  
HUNDRED (\$18,400) DOLLARS )  
IN UNITED STATES CURRENCY, )

DEFENDANT. )

VERIFIED COMPLAINT FOR FORFEITURE IN REM

The United States of America (hereinafter, "United States"), by and through Leura G. Canary, United States Attorney, Middle District of Alabama, and John T. Harmon, Assistant United States Attorney, in a civil cause of forfeiture in rem respectfully alleges as follows:

NATURE OF THE ACTION

1. This is an action to forfeit and condemn to the use and benefit of the United States the following property: Eighteen Thousand Four Hundred (\$18,400) Dollars in United States currency (hereinafter, "Defendant currency") which was seized from Royce Williams on July 27, 2007, for violations of Title II of the Controlled Substances Act, 21 U.S.C. §§ 801 et seq.

JURISDICTION AND VENUE

2. The United States brings this action in rem in its own right to forfeit and condemn the Defendant property under 21 U.S.C. § 881. This Court has jurisdiction over this action under 28

U.S.C. §§ 1345 and 1355(a). This Court has in rem jurisdiction over this action under 28 U.S.C. § 1355(b).

3. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1) and 28 U.S.C. § 1395 because the acts or omissions giving rise to the forfeiture occurred in this district and the property is located within the Middle District of Alabama.

THE DEFENDANT IN REM

4. The Defendant consists of Eighteen Thousand Four Hundred (\$18,400) Dollars in United States currency (hereinafter, "Defendant currency") which was seized from Royce Williams on July 27, 2007.

FACTS

5. The facts and circumstances supporting the seizure of the Defendant currency are as follows:

a) On July 27, 2007, law enforcement agents executed a search warrant at 867 County Road 227, Clanton, Chilton County, Alabama. During the search approximately 408 marijuana plants, approximately 3 plastic containers of dried marijuana, firearms, weight scales of a type used in drug trafficking, items used in marijuana cultivation, drug paraphernalia, and \$18,400 in United States currency (the Defendant currency) were seized from the property and structures thereon.

b) On or about October 2, 2007, Royce Williams filed a claim, asserting ownership of the Defendant Eighteen Thousand Four Hundred (\$18,400) Dollars in United States currency.

CLAIM FOR RELIEF

6. The United States repeats and realleges each and every allegation set forth in Paragraphs 1 through 5(a) and (b) above.

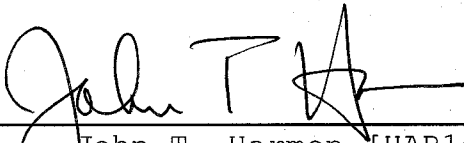
7. The Defendant currency constitutes monies furnished, or intended to be furnished, in exchange for controlled substances, or represents proceeds of trafficking in controlled substances or was used or intended to be used to facilitate violations of 21 U.S.C. §§ 801 et seq.

8. As a result of the foregoing, the Defendant currency is liable to condemnation and to forfeiture to the United States for its use in accordance with 21 U.S.C. § 881(a)(6).

WHEREFORE, the United States requests that the Court issue a Warrant for the arrest and seizure of the Defendant currency, pursuant to Supplemental Rule G(3)(b), which will be executed upon the Defendant currency pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c); that the Defendant currency be forfeited and condemned to the United States; that the United States be awarded its costs and disbursements in this action and, for such other and further relief as this Court deems proper and just.

Respectfully submitted this the 19<sup>th</sup> day of December, 2007.

FOR THE UNITED STATES ATTORNEY  
LEURA G. CANARY



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John T. Harmon [HAR108]  
Assistant United States Attorney

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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

STATE OF ALABAMA                    )  
COUNTY OF MONTGOMERY            )

VERIFICATION

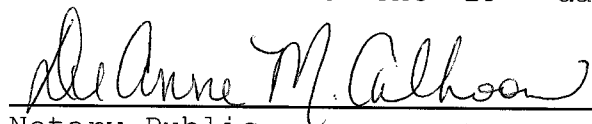
I, Doug Walters, hereby verify and declare under penalty of perjury that I am a Task Force Agent with the United States Drug Enforcement Administration, that I have read the foregoing Verified Complaint In Rem and know the contents thereof, and that the matters contained in the Verified Complaint are true to my own knowledge, except that those matters herein stated to be alleged on information and belief and as to those matters I believe them to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct on this 19<sup>th</sup> day of December, 2007.

  
\_\_\_\_\_  
Doug Walters-Task Force Agent  
Drug Enforcement Administration

Sworn to and subscribed before me this the 19<sup>th</sup> day of December, 2007.

  
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Notary Public  
Commission Expires: 04/02/2011